

NATHANIEL SCOTT  
6808 Northport Road  
Edgemere, Maryland 21219

*Plaintiff*

v.

RESTAURANT DEPOT, LLC  
Serve On:  
Resident Agent:  
COGENCY GLOBAL INC.  
1519 York Road  
Lutherville, Maryland 21093

*Defendant*

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY  
\* CASE No.:

2021 JAN 14 4:10:58  
CLERK DIVISION  
Jan. 26<sup>th</sup>

\* \* \* \* \*

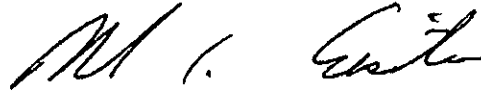
**COMPLAINT AND**  
**ELECTION OF JURY TRIAL**

Now comes the Plaintiff, Nathaniel Scott, by Michael C. Eisenstein, his attorney, and  
sues Restaurant Depot LLC, Defendant.

1. For that on or about July 13, 2020 at 1:45 PM, the Plaintiff, was a business invitee  
at Defendant's premises. While walking in the fresh produce isle of Defendant's  
premises, a forklift left on the isle was sticking out and caused the Plaintiff, a  
business invitee at the time, to slip and fall sustaining bodily injuries. That  
Defendant's premises Restaurant Depo LLC is located 3405 Annapolis Road,  
located in Baltimore City, Maryland.

2. When at the aforesaid time and place, the Defendant, who owned and managed the aforesaid premises, failed to keep the premises in a safe condition and dangerous condition, which thereby caused the Plaintiff to sustain severe and painful injuries when he was caused to slip and fall on the forklift left on the isle, which was negligent to expose the Plaintiff, a business invitee at the time to be exposed to the ultra-hazardous condition.
3. That the aforesaid accident and resulting injuries to the Plaintiff was the result of the negligence of the Defendant, in that they failed to maintain the premises and the grocery isle in a safe condition for business invites, as the Plaintiff; that Defendant failed to keep said area free of dangerous conditions, which then existed on the Defendants' store, which Defendant had knowledge of when, in the exercise of due care and caution should have kept forklift and blades exposed to business invitees; and in other respects, said premises were negligently maintained and operated.
4. That as a result of the aforesaid accident, the Plaintiff, Nathaniel Scott, was caused to suffer serious, painful and permanent injuries to his body and limbs for which he was caused to seek, and continues to seek medical care and attention.
5. That the aforesaid accident was caused solely by the negligence of the Defendant, without any negligence on the part of the Plaintiff, Nathaniel Scott, thereunto contributing.

**WHEREFORE**, this suit is brought and the Plaintiff, Nathaniel Scott, claims One Hundred Thousand (\$100,000.00) Dollars Damages against Defendant Restaurant Depo LLC.

A handwritten signature in black ink, appearing to read "M. C. Eisenstein", is positioned above a horizontal line.

MICHAEL C. EISENSTEIN

*Attorney for Plaintiff*

201 North Charles Street, Suite 1504

Baltimore, Maryland 21201

(410) 539-4446

Email: MEISEN9481@AOL.COM

CPF # 8312010129

NATHANIEL SCOTT  
6808 Northport Road  
Edgemere, Maryland 21219

*Plaintiff*

v.

RESTAURANT DEPOT, LLC  
Serve On:  
Resident Agent:  
COGENCY GLOBAL INC.  
1519 York Road  
Lutherville, Maryland 21093

*Defendant*

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY  
\* CASE No.:

\*

\*

\*

\*

\*

\*

\*

\*

\*

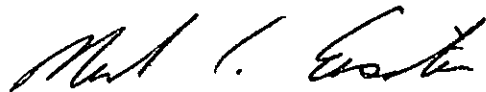
\*

\*

**ELECTION OF JURY TRIAL**

MR. CLERK:

The Plaintiff herein elects to have this case tried before a jury.



---

MICHAEL C. EISENSTEIN  
*Attorney for Plaintiff*  
201 North Charles Street, Suite 1504  
Baltimore, Maryland 21201  
(410) 539-4446  
Email: MEISEN9481@AOL.COM  
CPF # 8312010129